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June 6, 2014

**VIA E-Filing**

Allan Arlow, Law Judge  
Oregon Public Utility Commission  
3930 Fairview Industrial Dr. SE  
Salem, OR 97302

**Re: Docket UM-1481 – Response to Bench Request No. 5**

Dear Filing Center:

Enclosed for filing in the above referenced matter is AT&T's response to the Bench Request issued on May 5, 2014, and clarified on May 8, 2014, in Docket UM-1481.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "David Collier", written over a horizontal line.

David Collier  
Area Manager – Regulatory Relations

Attachment

cc: Service List (redacted version only)

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF OREGON**

**UM 1481**

|   |   |                                     |
|---|---|-------------------------------------|
| In the Matter of                        | ) |                                     |
|   | ) | <b>AT&amp;T'S RESPONSE TO BENCH</b> |
| PUBLIC UTILITY COMMISSION OF            | ) | <b>REQUEST NO. 5</b>                |
| OREGON                                  | ) |                                     |
|   | ) |                                     |
| Investigation into the Oregon Universal | ) |                                     |
| Service Fund.                           | ) |                                     |
|   | ) |                                     |
|   | ) |                                     |
|   | ) |                                     |

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AT&T Corp., and New Cingular Wireless PCS, LLC (“AT&T Mobility”) and its affiliates operating in Oregon hereby submit this response to Bench Request No. 5 in the above-referenced docket.

**BENCH REQUEST**

For all parties:

5. For each OUSF-supported exchange: all non-ILEC providers of terrestrial-based broadband services, including, but not limited to, cable and wireless providers.
  - a. For each such provider, information as to whether it offers telephony services over those facilities.
  - b. For each such provider, whether such telephony services are offered over its own facilities or via resale of ILEC-provided facilities.
  - c. For each such provider, the market penetration of broadband services.

**RESPONSE**

AT&T Corp.

AT&T Corp. objects to this request to the extent that it requests information that the

company does not maintain in the ordinary course of business, is not readily available, and would be burdensome to produce. AT&T Corp. also objects to this request to the extent it seeks information about services that are not subject to the Commission's jurisdiction. In addition, AT&T Corp. notes that there is information at <http://www.puc.state.or.us/Pages/highspeedinternetmaps.aspx> regarding broadband services available in the state.

Subject to and without waiving its objections, AT&T Corp. provides the following response:

- a. To the extent that AT&T Corp. provides terrestrial-based broadband service as defined by the ALJ in any OUSF-supported exchange, Voice over Internet Protocol (VoIP) service is offered over those facilities.
- b. To the extent that AT&T Corp. provides any terrestrial-based broadband service as defined by the ALJ in any OUSF-supported exchange the service is offered over its own facilities.
- c. AT&T Corp. does not have market penetration information readily available.

When available, AT&T Corp. will provide a confidential supplement to this response with the OUSF-supported exchanges in which it currently provides terrestrial-based broadband services to at least one customer.

AT&T Mobility:

AT&T Mobility objects to this request to the extent that it requests information that the company does not maintain in the ordinary course of business, is not readily available, and would be burdensome to produce. AT&T also objects to this request to the extent it

seeks information for “all non-ILEC providers of terrestrial-based broadband services, including...wireless providers” because as a commercial mobile radio service (“CMRS”) provider, AT&T Mobility is generally not subject to the Commission’s jurisdiction. In addition, AT&T Mobility notes that there is information at <http://www.puc.state.or.us/Pages/highspeedinternetmaps.aspx> regarding broadband services available in the state. Nevertheless, AT&T Mobility provides the response below on a voluntary basis to assist the Commission.

- a. To the extent that AT&T Mobility provides terrestrial-based broadband as defined by the ALJ in any OUSF-supported exchange it also provides voice service in those areas.
- b. To the extent that AT&T Mobility provides any terrestrial-based broadband service as defined by the ALJ in any OUSF-supported exchange the service is offered over its own facilities.

When available, AT&T Mobility will provide a confidential supplement to this response with the OUSF-supported exchanges in which it currently provides terrestrial-based broadband services to at least one customer.

CERTIFICATE OF SERVICE  
UM 1481

I hereby certify that I served the foregoing service list change in the above entitled docket on the following persons via U.S. Mail, by mailing a correct copy to them in a sealed envelope, with postage prepaid, addressed to them at the address shown below, or via email only if the service list indicates such persons waive paper service.

|   |  |   |
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(W) = Waive Paper Service  
(C) = Confidential

DATED this 6<sup>th</sup> day of June, 2014

AT&T

By:  \_\_\_\_\_

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